

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
ST. JOSEPH DIVISION**

TERI DEAN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.: 5:19-cv-06022-SRB
	)	
EDWARD BEARDEN, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**Motion for Leave to File First Amended Answer**

Defendants Edward Bearden, Elijah Mosier, and Todd Mustain seek leave of Court under Federal Rule of Civil Procedure 15(a)(2) to file their First Amended Answer, which is attached to this motion as Exhibit A, to assert the affirmative defense of failure to exhaust administrative remedies to counts I, II, and III of Plaintiff's Complaint.

For these reasons, and the reasons in the accompanying suggestions, Defendants Bearden, Mosier, and Mustain respectfully request that the Court grant them leave to file their First Amended Answer to Plaintiff's Complaint and for such further relief as the Court deems just and proper.

Respectfully submitted,

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Attorney General

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**Certificate of Service**

I hereby certify that on April 6, 2021, I filed the foregoing electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Nicolas Taulbee  
Assistant Attorney General